

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

*Plaintiffs,*

v.

COX COMMUNICATIONS, INC., *et al.*,

*Defendants.*

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF THOMAS M. BUCHANAN IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO PRECLUDE  
CERTAIN EXPERT TESTIMONY BY W. CHRISTOPHER BAKEWELL**

I, Thomas M. Buchanan, hereby declare:

1. I am a partner with the firm of Winston & Strawn LLP, attorneys of record for Cox Communications, Inc. and CoxCom, LLC in this matter. I submit this Declaration in support of Cox's Opposition to Plaintiffs' Motion to Preclude Certain Expert Testimony by W. Christopher Bakewell. I have personal knowledge of all facts stated in this declaration and if called upon as a witness, I could and would competently testify thereto.

2. **Exhibit 1** is a true and correct copy of excerpts from the transcript of the June 4, 2019 deposition of W. Christopher Bakewell.

3. **Exhibit 2** is a true and correct copy of excerpts from the transcript of the June 25, 2019 deposition of William H. Lehr, Ph.D.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24 day of September, 2019 in Washington, DC.

s/ Thomas M. Buchanan  
Thomas M. Buchanan (VSB No. 21530)